

To: Dresser, Chris[Dresser.Chris@epa.gov]
From: Ostendorf, Jody
Sent: Wed 10/12/2016 5:01:47 PM
Subject: Emission Inventory piece for Gov. Herbert letter

1) Any proposed tribal FIP should be based on the most recent emission inventory for the region.

We developed the proposed rule based on emissions information that we received from 2011 through mid-2015. The information is from existing minor source registration data submitted by the operators on Indian country lands within the U&O Reservation under the Federal Indian Country Minor NSR rule. This data set is comprehensive, because existing minor sources make up the vast majority of existing oil and natural gas sources in these areas. Several Uinta Basin ozone field studies conducted between 2011 and 2014 have found that ozone production is sensitive to reductions in VOC emissions, but may be relatively insensitive to reductions in nitrogen oxide emissions. Therefore, we believe that existing minor source registration data provide a robust basis for the proposed FIP, strongly supporting the conclusion that oil and natural gas VOC emissions on Indian country lands within the U&O Reservation are a significant contributor to ozone production, and that the VOC emission controls proposed in the FIP will reduce these emissions and result in air quality benefits in the Basin.

The Uinta Basin emissions inventory project that you mention is an independent effort to improve air quality modeling performance in the Uinta Basin as a whole. We are currently reviewing the 2014 emissions inventory data set in coordination with DAQ, and plan to update the cost/benefit analysis for our final FIP to reflect the 2014 emissions inventory after we have completed quality assurance review of the data.

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